

Variance Process Overview

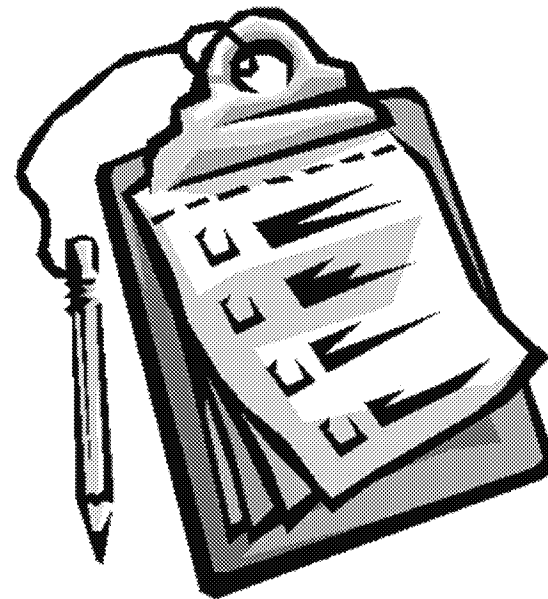
Water Quality Standards and Assessment

Presentation to Willamette Basin Mercury MDV Advisory Committee
April 4, 2019

DEQ Headquarters, Portland, OR

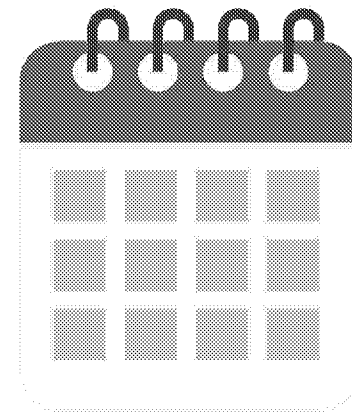
Topics

- Application and review process
- Overview of variance requirements
- HAC Re-evaluation



Application timing

- During permit renewal
 - Coordinate public comment period
 - Determine appropriate limit based on level currently achievable



CALENDAR



Application submittal

- Request for coverage under MDV
- Available effluent mercury data (and other available mercury data)
- Draft MMP for term of permit or variance.*
- Description of treatment and whether upgrade is anticipated.



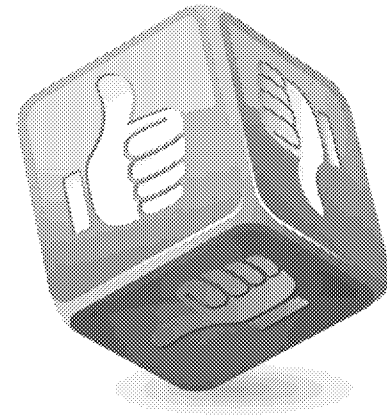
DEQ Review

- Sufficient mercury data to describe LCA
 - Minimum two years and up to five years.
 - LCA will be included in DEQ Fact Sheet for permit
- MMP meets variance and state requirements.



DEQ Approval

- Public notice
- Address comments, as appropriate.
- Variance and MMP approved as part of permit issuance.
- Variance requirements are enforceable permit conditions.



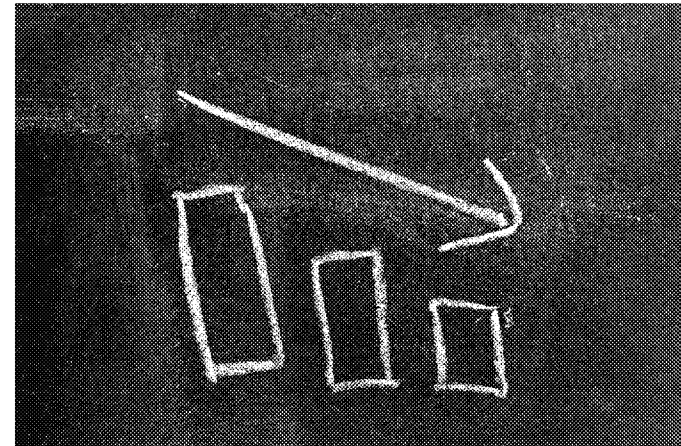
Variance-related requirements

- Effluent monitoring
 - Quarterly
 - Can be done in conjunction with pre-treatment
- Implement MMP, including any additional monitoring.
- LCA-based effluent limit.*
- Annual progress reports.



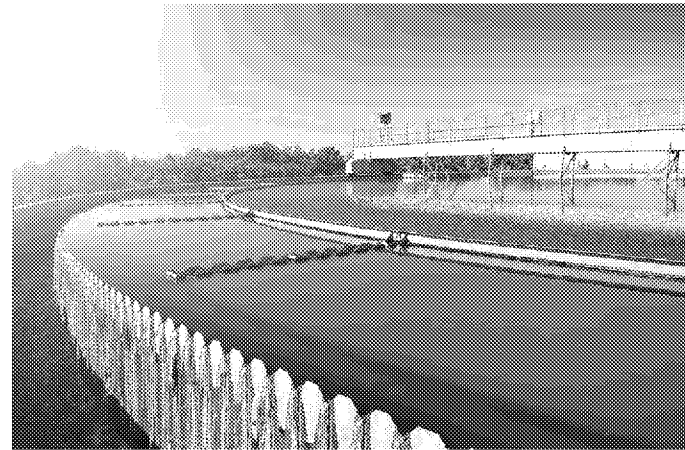
HAC Re-evaluation – Site-specific

- During permit renewal?
- Has progress been made?
 - Overall trend (effluent, influent, biosolids)
 - Re-calculate LCA with recent data.
- Update effluent limit in renewed permit.
 - At least as stringent as previous permit.
- If LCA/effluent limit has significantly increased, additional commitments in MMP.



HAC Re-evaluation – General

- DEQ will:
 - Revisit technology evaluation to determine if upgrades can achieve standard or make progress above advanced treatment.
 - Revisit evaluation that advanced treatment causes more environmental harm than minimization.



Questions and discussion



DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.

